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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

DIVISION

(Write the full name of the plaintiff in this action.
Include prisoner registration number.)

Kevin Jerome Moore
v.

St. Louis City Jail Justice Center

Case No: _____
(to be assigned by Clerk of District Court)

Plaintiff Requests Trial by Jury



Yes



No

(Write the full name of each defendant. The caption
must include the names of all of the parties.
Fed. R. Civ. P. 10(a). Merely listing one party and
writing "et al." is insufficient. Attach additional
sheets if necessary.)

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff should not send exhibits, affidavits, witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed without prepayment of fees and costs.

I. The Parties to this Complaint

A. The Plaintiff

Name: Kevin Jerome Moore

Other names you have used: _____

Prisoner Registration Number: 156616

Current Institution: _____

Indicate your prisoner status:

<input checked="" type="checkbox"/> Pretrial detainee	<input type="checkbox"/> Convicted and sentenced state prisoner
<input type="checkbox"/> Civilly committed detainee	<input checked="" type="checkbox"/> Convicted and sentenced federal prisoner
<input type="checkbox"/> Immigration detainee	<input type="checkbox"/> Other (explain): _____

B. The Defendant(s)

To the best of your knowledge, give the information below for each defendant named in the caption of this complaint. Make sure the defendant(s) named below are the same as those listed in the caption of this complaint. Attach additional pages if necessary.

For an individual defendant, include the person's job title, and check whether you are suing the individual in his or her individual capacity, official capacity, or both.

Defendant 1

Name: St. Louis City Jail Justice Center

Job or Title: City Jail

Badge/Shield Number: _____

Employer: _____

Address: 200 South Tucker Blvd St. Louis, MO 63102

☒ Individual Capacity ☐ Official Capacity

Defendant 2

Name: _____

Job or Title: _____

Badge/Shield Number: _____

Employer: _____

Address: _____

☐ Individual Capacity

☐ Official Capacity

II. Statement of Claim

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

The St. Louis City Jail Justice Center is a place with poor living conditions for men and women. There are fruit flies and rats all around the facility and staff do not do anything to get rid of this problem. In ad-seg staff do not do cell clean up. There are inmates such as myself who's special needs who require mental health help and I am stuck in ad-seg and not afforded the chance to get out of ad-seg because the Superintendent wants me to tell on a Correctional Officer about a fight and since I will not tell and make any statements against this woman who use to be a C-O the Superintendent Adrian Barnes will not let me out of ad-seg and the Administrative staff knows that I had broke up a fight and had nothing to do with it but was attacked when I backed out the cell, I have been told that in order for me to get out ad-seg I must tell on this C-O and make a statement against her and I do not want to. I am locked in a cell and suffer mental anguish. St. Louis City Jail Justice Center is a hostile environment in 5-Bravo any one on ad-seg is not afforded any chance to get out of ad-seg, there are no programs offered to help inmates to better them self nor get their H-ses, we can not attend religious services, there is not an effective Law Library here at the St. Louis City Jail Justice Center. Staff do not follow the rules and the policy set in the St. Louis City Jail Justice Center unless it is to benefit staff. Inmates such as myself is treated unfairly. Administrative staff will not do as the inmate hand book say they are to do nor do Correctional staff follow rules and policy and do as the inmate hand book say they are to do. I have been in a cell with no running water for 7 months.

III. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

IV. Relief

State briefly and precisely what you want the Court to do for you. Do not make legal arguments. Do not cite any cases or statutes. If you are requesting money damages, include the amounts of any actual damages and/or punitive damages you are claiming. Explain why you believe you are entitled to recover those damages. I seek relief in the amount of 10,000 5000 in actual damages because I suffer daily and I am being punished because I do not want to tell on this woman who use to work here as a c-o and 5,000 in punitive damages because I feel that my mental illness has got worse and I don't know what to do I'm afraid to speak out due to further punishment, I also want them to pay filing fees, court fees and Attorney fees

V. Exhaustion of Administrative Remedies/Administrative Procedures

The Prison Litigation Reform Act ("PLRA") 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison or other correctional facility where you were confined at the time of the events giving rise to your claim(s):

St. Louis City Jail Justice Center

- B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

- C. If yes, does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claims?

☒ Yes

☐ No

☐ Do not know

If yes, which claim(s)? All my claims

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

St. Louis City Jail Justice Center

2. What did you claim in your grievance? (*Attach a copy of your grievance, if available*) My IRR has never been answered or it was trashed by staff

3. What was the result, if any? (*Attach a copy of any written response to your grievance, if available*) My IRR has never been answered or it was trashed by staff so there was no response

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (*Describe all efforts to appeal to the highest level of the grievance process.*) My IRR was never answered

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

My IRR was never answered or it was trashed

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any: I told all St. Louis City Jail Justice Center staff of these problems dating back to March 25, 2021

- G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies. I do not have no copies of my IRR

(*Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.*)

VI. Previous Lawsuits

The “three strikes rule” bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has “on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury.” 28 U.S.C. § 1915(g).

- A. To the best of your knowledge, have you ever had a case dismissed on the basis of this “three strikes rule”?

☐ Yes

☒ No

If yes, state which court dismissed your case and when it was dismissed. Attach a copy of the court’s order, if possible.

Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff _____

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the state and county)*

3. Docket or case number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____
6. Is the case still pending?
- ☐ Yes
- ☐ No (If no, give the approximate date of disposition): _____
7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)
- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?
- ☐ Yes ☒ No
- D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)
1. Parties to the previous lawsuit
- Plaintiff _____
- Defendant(s) _____
2. Court (if federal court, name the district; if state court, name the state and county)
3. Docket or case number _____
4. Name of Judge assigned to your case _____
5. Approximate date of filing lawsuit _____

6. Is the case still pending?

☐ Yes

☐ No (If no, give the approximate date of disposition): _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

VII. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 1 day of December, 2021.

Signature of Plaintiff

Deven Moore